

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Annual Assessment of the Status of	)	MB Docket No. 12-203
Competition in the Market for the	)	
Delivery of Video Programming	)	

**REPLY COMMENTS OF  
JCTV**

**JCTV** submits these reply comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming” and the opening comments filed in this proceeding.

JCTV is a PEG channel located in Jefferson City, Missouri. The City of Jefferson awarded the contract to operate JCTV to Lincoln University of Missouri, a historically black, 1890 land-grant, public, comprehensive institution that provides excellent education opportunities including theoretical and applied learning experiences to a diverse population within a nurturing, student-centered environment. JCTV has been operating on the campus of Lincoln University since 1989. JCTV is managed and operated by three full-time Lincoln University employees, including the Station Manager, Chief Operator and Assistant Operator. Technical and equipment repair assistance is provided by the Chief Engineer of KJLU, a public radio station located on the campus of Lincoln University.

JCTV serves the City of Jefferson in numerous ways. The channel cablecasts City Council and Planning and Zoning Commission meetings live, and re-airs the telecasts several times throughout the week. Televising these meetings increases transparency in local government and allows people to watch the meetings if they cannot attend them due to transportation, mobility or scheduling issues. JCTV also runs a community calendar, alerting Jefferson City residents about upcoming deadlines, surveys or other action they can participate in to have a shared hand in the governance of their city. The channel is the also the only media outlet that televises live candidate forums and debates for local races in their entirety. These forums are held several times a year and are replayed on JCTV several times a week in the weeks before an election. And several City-sponsored parades, festivals and concerts are televised on JCTV for the entertainment of our viewers.

JCTV serves the community by offering low-cost training in studio and field production, as well as editing using Adobe Premiere Pro CS4 software. All residents of Jefferson City have access to cable-casting time on JCTV, as well as access to a completely renovated 1600 square-foot studio and all studio equipment. All residents of Jefferson City can create programming for the channel, and we often assist in the production of such programs. We also produce programming for a number of local, non-profit entities, including the United Way of Central Missouri; the Heart of Missouri Chapter of the American Red Cross; Jefferson City Public Schools; the Jefferson City Daycare Center; the Jefferson City Jaycees; the Jefferson City Area Chamber of Commerce; Start-Up Jeff City; JCMG; the Missouri River Regional Library; and the Downtown Association, just to name a few. The access channel also televises productions provided to us by the Missouri State legislature; the Missouri National Guard; the Salute to

American Foundation, the U.S. Army, Navy and Air Force; the Missouri Contemporary Ballet; and several local churches.

One of JCTV's most important endeavors is in the support it provides to the Journalism department at Lincoln University. JCTV is a living laboratory for LU students, allowing them to gain hands-on experience in operating the same equipment used in professional television studios across the country. JCTV employees provide training in the use of studio and field production equipment, as well as editing software, to the students of Lincoln University. The staff members also assist with the production of several student-produced programs, including Blue Tiger View, LU Insider and The Hill.

Several changes to the regulations put in place in regard to PEG channels have made it difficult for JCTV to continue to grow, and, most alarmingly, to exist. The City of Jefferson's loss of supervision of cable franchises operating within the municipality allowed the local cable provider, Mediacom, to make several drastic changes to JCTV. Most recently, JCTV was moved from its long-time placement in analog channel three to the digital-tier channel 81. All Mediacom customers who did not have the higher-priced digital cable package or a digital converter box were not able to view JCTV. Mediacom customers could request a box, but were assessed a monthly service charge on their bill. In addition, Lincoln University students who lived in campus residence halls were not able to watch JCTV without a converter box. Mediacom representatives promised to make the channel accessible to on campus students, but never followed through on that promise.

As previously mentioned, the very existence of JCTV is at stake. The City of Jefferson receives franchise fees from Mediacom every year; however, changes in the law mean that the City is no longer required to use a portion of those fees to operate a PEG channel. For fiscal year

2013, the Mayor of Jefferson City, Eric Struempf, proposed eliminating all funding for the PEG channel. The City Council ultimately voted to reduce JCTV's funding from \$165,000 a year to \$110,000 for nine months of continued operation. The City administration has indicated that after June of 2013, all City funding for JCTV will halt; resulting in the effective shut-down of JCTV.

The lack of regulatory authority over PEG channels has resulted in the slow erosion of any entity's ability to continue to provide hyper-local television programs in communities across the country. Despite advances in technology that allow people to access local content via new mediums, television remains the most-used and accessible medium for news and entertainment. We ask that you keep community media interests in mind and take the action needed to preserve the existence and operation of PEG channels.

*Gloria Enloe, Station Manager, JCTV*

*10/09/2012*

*(573)681-5443*

*enloeg@lincolnu.edu*